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August 25, 2021

Hon. Laura Taylor Swain
Chief United States District Judge
United States District Court for the
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *United States of America v. Constantinescu, et al.*
Indictment No.: 19-CR-651

Dear Judge Swain:

I am counsel to Defendant Florian Martin. Mr. Martin is currently scheduled for a remote status conference before Your Honor on September 8, 2021. I write to respectfully request at least a one-month adjournment to any date convenient to the Court, the government and counsel.

We continue to engage the government in final plea negotiations and to review discovery. Mr. Martin, who remains in custody at the MCC New York, continues to review the contents of his discovery.

I have spoken with the government, by AUSA Samuel Rothschild, who consents to this request.

Mr. Martin consents to the exclusion of time from the speedy trial clock from today through the adjourned date. This will permit him the opportunity to continue to both review discovery and engage in plea discussions.

The Court's consideration is greatly appreciated.

Respectfully submitted,

/s/ Edward V. Sapone

Edward V. Sapone

Cc: AUSA Elizabeth Hanft, Esq.
AUSA Robert Sobelman, Esq.
AUSA Samuel Rothschild, Esq.

The foregoing request for adjournment is granted. The conference is hereby rescheduled for October 20, 2021 at 10:30am. The Court finds pursuant to 18 USC section 3161(h)(7)(A) that the ends of justice served by an exclusion of the time from today's date through October 20, 2021, outweigh the best interests of the public and the defendant in a speedy trial for the reasons stated above. Docket entry #812 resolved.

SO ORDERED.

8/30/2021

/s/ Laura Taylor Swain, Chief USDJ